

1401 Eye Street, NW Seventh Floor Washington, DC 20005

Telephone: (202) 467-6900 Fax: (202) 467-6910 www.wcsr.com Jennifer M. Kashatus Attorney

Direct Dial: (202) 857-4506 Direct Fax: (202) 261-0006 E-mail: JKashatus@wcsr.com

March 3, 2008

#### **VIA ECFS**

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20005

Re: Broadvox, LLC, Form 499 Filer ID 826005, EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Broadvox, LLC and InfoTelis Corporation, through it undersigned counsel and in accordance with the Commission's *Public Notice* DA 08-171 in the above-referenced docket, please find its annual Customary Proprietary Network Information Certificate and accompanying statement.

Please contact me if you have any questions regarding this filing.

Respectfully submitted,

WOMBLE CARLYLE SANDRIDGE & RICE A Professional Limited Liability Company

Jennifer M. Kashatus

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# Annual 47 C.F.R. § 64.2009 CPNI Certification

### EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2007

Names of Companies covered by this certification: Broadvox LLC (Form 499 Filer ID 826005) InfoTelis Corporation (Form 499 Filer ID 826004)

Name of Signatory: Pete Sandev

Title of Signatory: Vice President, Customer Care, Broadvox LLC;

President, InfoTelis Corporation

I, Pete Sandey, certify that I am an officer of Broadvox LLC and InfoTelis Corporation (collectively "Broadvox"), and acting as an agent of Broadvox, that I have personal knowledge that the company has operating procedures and policies in place that are designed to ensure compliance with the Federal Communication Commission's ("Commission") CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures are designed to maintain compliance with the Commission's CPNI rules.

Broadvox has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. Broadvox did not receive any complaints in the past year concerning the unauthorized release of CPNI.

Broadvox has taken measures to protect against attempts to gain unauthorized access to CPNI. Broadvox has not discovered any information about the processes that pretexters are using to attempt to gain access to CPNI other than the information that already is contained publicly in this docket. As mentioned in Attachment A, Broadvox has implemented CPNI safeguards, including, without limitation, maintaining customer verification processes, and applying role-based authorization (limiting employees with access to data on a need-to-know basis).

Signed: s/Pete Sandrev

March 1, 2008

#### ATTACHMENT A

# BROADVOX LLC AND INFOTELIS CORPORATION STATEMENT OF CPNI OPERATING PROCEDURES

Broadvox LLC and InfoTelis Corporation (collectively, "Broadvox"), provide interconnected Voice over Internet Protocol ("VoIP") services. Broadvox has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure, and access to CPNI. Broadvox provides this statement pursuant to Section 64.0009(e) of the Commission rules, 47 C.F.R. § 64.0009(e), to summarize those procedures and policies. As part of these processes and procedures, Broadvox has appointed a compliance officer, responsible for overseeing the company's compliance with the FCC's CPNI rules.

#### PERMISSIBLE USES OF CPNI

Broadvox is committed to protecting its customers' privacy, and it limits its employees access to and use of CPNI. Broadvox may use CPNI for the following purposes: (1) to initiate, provide, and bill and collect for the telecommunications services from which such information is derived; (2) to provide the services necessary to, or used in, the provision of the VoIP services that Broadvox provides, including in the publishing of directories; (3) to market services to our customers within the category of service to which the customer subscribes; and (4) to protect our rights and property, or to protect our customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services. We also may use CPNI to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if the customer initiated the call and approves of the use of such information to provide services.

Broadvox has implemented protections to protect against unauthorized disclosure or access to CPNI in the limited instances where it is required to share or disclose CPNI with third parties, such as for billing and collection.

#### USE OF CPNI FOR MARKETING PURPOSES

Broadvox does not use CPNI to market products and services to customers. Therefore, it is not subject to the customer notice requirements. If Broadvox subsequently seeks to use CPNI to market products and services for such purposes, then it will provide advance customer notification and seek appropriate approval from its customers before doing so. Broadvox does not share CPNI with joint venture partners or independent contractors for marketing purposes.

## **EMPLOYEE TRAINING/DISCIPLINARY PROCESS:**

Broadvox trains its personnel as to what information is classified as CPNI and as to when they are and are not authorized to use CPNI. Broadvox has an express disciplinary process for the misuse of CPNI, which includes the potential for termination.

#### **SAFEGUARDS**

Employees must follow specific procedures to authenticate its customers. Broadvox authenticates all in-coming calls. Broadvox also has implemented password protection for online account access. All online accounts are password protected, and Broadvox establishes those passwords without the use of readily available biographical information or account information. Broadvox also has implemented procedures to address lost or stolen passwords (such as challenge questions) that do not rely on the use of readily available biographical or account information. Broadvox does not have any retail locations.

All Broadvox employees are prohibited from disclosing call detail information during an in-bound call. Employees only are permitted to disclose call detail information to the email address of record. Broadvox has procedures in place to ensure that the email address has been in place for at least thirty days. Broadvox also limits internal disclosure of CPNI to those employees with a need-to-know.

Broadvox has implemented network security measures, including, but not limited to, the use of encryption. Under Broadvox's compliance program, employees are required to ensure that customer data is protected from pretexting and other unauthorized access. Broadvox employees are required to notify the Compliance Officer of any suspected attempts to gain access to a customer's CPNI whether through pretexting or otherwise.

Broadvox has implemented procedures for notifying customers of certain account changes, including, changes in online passwords, changes to online accounts, changes to a back-up means of authentication, and changes to the address of record.

Broadvox has procedures in place for responding to requests for information from law enforcement personnel or from any person other than the customer.

#### **DATA SECURITY BREACHES**

Broadvox will notify the United States Secret Service and the Federal Bureau of Investigation through the FCC's specifically designated portal (<a href="www.fcc.gov/eb/cpni">www.fcc.gov/eb/cpni</a>) within seven days of the reasonable discovery of a data breach. In accordance with the FCC's rules, Broadvox will notify affected customers of the breach, unless requested to withhold disclosure by the USSS or the FBI. Broadvox's Compliance Officer will maintain a record in accordance with section 64.2011(d) of any breaches discovered, notifications made to law enforcement, and notifications made to customers for at least two years.

#### **CUSTOMER COMPLAINTS**

Broadvox tracks customer complaints it receives concerning the unauthorized use, disclosure, or access to CPNI. If we receive complaints regarding CPNI, we will break them down by category, and provide a summary of the complaints in the annual certification that we provide to the Commission.

# NOTIFICATION OF ACCOUNT CHANGES

Broadvox notifies its customers immediately, via email, of certain account changes including any changes in the customer's online password, a change in the customer's address of record, a change in the customer's online account, and a change of the back-up means of authentication for lost or stolen passwords.